

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

ARCONIC INC.,	:	
	:	
Plaintiff,	:	No. 2:17-CV-01434
	:	
v.	:	
	:	Chief District Judge
	:	Joy Flowers Conti
NOVELIS INC.,	:	
NOVELIS CORP.,	:	
	:	
Defendants.	:	

**DEFENDANTS' RESPONSE TO
PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE**

Defendants Novelis Inc. and Novelis Corp. (collectively "Novelis") by and through its undersigned counsel files this Response to Plaintiff's Response to Order to Show Cause (Dkt. 110) and the Court's April 18, 2018 Order to Show Cause (Dkt. 108) why Arconic's Amended Complaint should not be stricken.

Novelis concurs with Arconic's position and believes the Amended Complaint should be stricken because (a) Arconic did not seek leave of the Court to amend its Complaint under Federal Rule of Civil Procedure 15, and (b) Arconic's Amended Complaint exceeds the scope of the Special Master's Report and Recommendation #5. If Arconic moves for leave to amend its Complaint, the Court should only grant leave consistent with the Special Master's Report and Recommendation #5.

Novelis also agrees that Arconic's Amended Complaint should be sealed because it contains confidential information Novelis provided to Arconic labeled with a confidentiality designation. Novelis requests that Arconic first meet and confer with Novelis if it seeks to amend its complaint to include confidential information. If Arconic seeks to challenge Novelis's

confidentiality designations, Novelis requests that Arconic follow the process set forth in section 5 of the Protective Order (Dkt. 79).

Respectfully submitted,

**NOVELIS INC. AND NOVELIS CORP.,
DEFENDANTS**

Dated: May 1, 2018

/s/ Natalie Hanlon Leh

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CERTIFICATE OF SERVICE

I hereby certify that on May 1, 2018, the foregoing document was electronically filed and served upon counsel for the Plaintiff through the Court's ECF system:

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